

ANALYSIS OF THE ECONOMIC LOSS TO

RONALD GREENFIELD

March 21, 2023

100 Eagle Rock Avenue Suite 200 East Hanover, NJ 07936 Phone 973-929-3532
730 3rd Avenue 11th Floor New York, NY 10017 Phone 212-842-7695

www.ecostat.com

SUMMARY

In our analysis of this matter, we find the present value of Mr. Ronald Greenfield's

economic loss, as a result of his injury on March 19, 2016, to be **2870,621** (New Israeli Shekel),

or \$237,875 (U.S. Dollars), at the exchange rate of \$1 USD to №3.66 NIS as of the time of this

written report.

In calculating the above-noted expected economic loss, we assume that Mr. Greenfield

will continue to reside in Israel and, had he not been injured, would have continued be employed

as a bookkeeper, or in a similar occupation, throughout his expected worklife.

Any unreimbursed expenses incurred or to be incurred by Mr. Greenfield, such as for

medical treatments, are not included in our economic analysis.

We reserve the right to amend this report, upon request, should we be presented with any

new relevant information that would have a material effect on our analysis.

ECONOMIC REPORT

At the request of Megan Marchick Le, Esq., of The Berkman Law Office, LLC, we have projected Mr. Ronald Greenfield's economic loss as a result of his injury on March 19, 2016.

BACKGROUND

In connection with the above request, and by using standard economic and statistical references as well as current data sources, we learned the following information, all of which we assume to be true:

Ronald Greenfield was born on December 5, 1956.

Ronald was injured on March 19, 2016, during a terrorist attack in Istanbul, Turkey. At that time, he was 59.3 years old.

At the time of his injury, Mr. Greenfield was employed as a bookkeeper by Gordon Gas and Chemical Company. He is a U.S. and Israeli citizen and has been residing in Israel since he was 12 years old.

Mr. Greenfield's statistical life expectancy at the time of his injury was an additional 24.1 years to the year 2040.3, at which time he will be 83.4 years old [Source: Israel Central Bureau of Statistics. Complete Life Tables of Israel 2015 -2019, Publication No. 1833, July 2021. Table 1 Total Population – Males, Page 18].

RONALD GREENFIELD'S PROJECTED EARNINGS

Based on the information presented to us, and by using standard economic and statistical references as well as current data sources, we analyze and assess the following economic expectancies:

Earnings. Mr. Greenfield earned №243,120 in 2014, and №131,853 in 2015 (New Israeli Shekel) [Source: Mr. Greenfield's Wage Tax Statements]. In U.S. dollars at an exchange rate of 1 USD to 3.66 NIS, Mr. Greenfield earned \$66,426 in 2014 and \$36,025 in 2015. We establish Mr.

Greenfield's earnings had he not been injured to be 131,853 per year, based on his earnings in 2015.

Wage Growth Rate. The following table shows the average wage growth rate in Israel from 2016 through 2021.

	Wage
Year	Growth Rate
2016	2.2%
2017	3.0%
2018	3.5%
2019	2.9%
2020	6.5%
2021	2.3%

Source: Israel Central Bureau of Statistics. Statistical Abstract of Israel 2016 through 2021. Employee Jobs, Wages and Average Wages Per Employee Job. Table 9.35 (percent calculated by author)

We apply the above wage growth rates to Mr. Greenfield's wages from 2016 through 2021, and thereafter we apply an average of 3.4% per year, the average growth rate from 2016 through 2021.

Statistical Unemployment. We reduce Mr. Greenfield's earnings for periods of statistical unemployment at the rate of 5.1% per year, based on the average unemployment rate in the last ten years in Israel [Source: Israel Bureau of Labor Statistics. Statistical Abstract of Israel 2012 through 2021. Unemployed Persons as Percent of Labor Force Table 9.23].

Taxes. We reduce Mr. Greenfield's earnings by a tax rate of 22.3% per year throughout his worklife for income taxes and payroll taxes [Source: Government of Israel Minister of Finance, Income Tax Brackets, Social Security and Health Insurance, January 2022. https://www.gov.il/ BlobFolder/reports/press-income-tax-brackets/he/ SalaryDataDetails tax bracket 2022.pdf].

Relevant Time Period. The table that follows shows the annual and cumulative present value of Mr. Greenfield's lost earnings from March 19, 2016, the date of his injury, to his 67th birthday,

the age at which he would have been eligible for full Israel Social Security retirement benefits [Source: Israeli National Insurance Institute, www.btl.gov.il.].

THE VALUE OF MR. RONALD GREENFIELD'S LOST EARNINGS

				UNEMPLOYMENT	ANNUAL		CUMULATIVE	
<u>YEAR</u>		<u>AGE</u>	WAGES	<u>EFFECTS</u>	<u>TAXES</u>	<u>LOSS</u>	<u>LOSS</u>	
Pre-Tr	ial L	osses:						
2016	-a	60	₪ 105,108	回 5,361	₪ 22,244	₪ 77,504	₪ 77,504	
2017		61	138,796	7,079	29,373	102,345	179,848	
2018		62	143,654	7,326	30,401	105,927	285,775	
2019		63	147,820	7,539	31,283	108,999	394,774	
2020		64	157,429	8,029	33,316	116,084	510,857	
2021		65	161,049	8,214	34,082	118,753	629,611	
2022		66	166,623	8,498	35,262	122,863	752,474	
2023	-b	67	71,787	3,661	15,192	52,933	805,407	
Expected Post-Trial Losses:								
2023	-c	67	88,441	4,510	18,717	65,214	65,214	

Pre-trial cumulative losses of № 805,407, plus post-trial cumulative losses of № 65,214, equal № 870,621

NOTES:

a- Lost earnings since March 19, 2016, the date of Mr. Greenfield's injury

b- Based on an assumed trial date of June 1, 2023

c- Expected lost earnings to Mr. Greenfield's retirement age of 67

CONCLUSION

From our economic analysis of the information presented to us, we find Mr. Ronald Greenfield's lost earnings as a result of his injury on March 19, 2016, to be **270,621** (New Israeli Shekel), which in U.S. dollars is equal to \$237,875.

Michael Soudry Michael Soudry, M.B.A.

Michael.Soudry@Marcumllp.com





COMPLETE LIFE TABLES OF ISRAEL 2015–2019

Publication No. 1833 www.cbs.gov.il

JERUSALEM, JULY 2021

TABLE 1. COMPLETE LIFE TABLE OF ISRAEL: TOTAL POPULATION – MALES

לוח 1. לוח תמותה שלם של ישראל: כלל האוכלוסייה – זכרים

2015-2019

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